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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
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11 MAUREEN HARRINGTON,
12 *AS PERSONAL REPRESENTATIVE FOR THE ESTATE*
13 *OF BLAINE HARRINGTON III,*

14 Plaintiff,

15 v.

16 DEEPAK DUGAR, M.D. a MEDICAL
17 CORPORATION,

18 Defendant.
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Civil Action No. 2:22-cv-08230-HDV-E

PLAINTIFF'S WITNESS LIST

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Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Maureen Harrington, Plaintiff, Personal Representative of the Estate of Blaine Harrington III (Plaintiff's Witness)	Mrs. Harrington will testify to her knowledge of Mr. Harrington's photography business. Her testimony is unique because she is the representative of Mr. Harrington's estate and is his next of kin by which she possesses some knowledge of his photographs and his experience (e.g., his career), based on whatever knowledge she possesses as his surviving spouse.	2 hour(s)	1 hour(s)	[Leave blank. To be filled in during trial]
Dr. Deepak Dugar, M.D., Owner of Deepal Dugar, M.D., a Medical Corporation (Defendant's Witness)	Dr. Dugar will testify as to how the photograph became displayed on his website, whether he licensed the work or had permission to do so, and how the work was used. Dr. Dugar's testimony is unique because he has the best knowledge of Defendant's use of the Work.	3 hour(s)	2 hour(s)	
Blaine Harrington III (deceased)	Mr. Harrington's testimony will be limited to deposition transcript testimony and video testimony from the deposition of Blaine Harrington III. Mr. Harrington's deposition will focus on his photograph business. The testimony will concern how he took photographs, the technique and skill behind them, as well as the value of his work. Mr. Harrington's testimony is unique because he is the photographer who captured the Work at issue in this lawsuit. He was in the best position to opine as to the	5 hour(s)	3 hour(s)	

1	Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
2		value of his work, as well as the technique and skill it			
3		took to capture his photographs.			
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6 *Indicates that witness will be called only if the need arises.

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